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Attorney for Plaintiff
Elizabeth Waterman

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

ELIZABETH WATERMAN,

Plaintiff,

v.

TIKTOK, INC.,

Defendant.

Civil Action No. 2:24-cv-04802-AB-AJR

**STIPULATION TO EXTEND
BRIEFING SCHEDULE AND
CONTINUE HEARING DATE FOR
DEFENDANT’S MOTION TO
DISMISS [DKT 24]**

Current Hearing Date: October 4, 2024
New Hearing Date: October 18, 2024

Plaintiff Elizabeth Waterman (“Plaintiff”) and Defendant TikTok Inc. (“Defendant”) stipulate and respectfully request that the Court extend the time for Plaintiff to file a Response to Defendant’s Motion to Dismiss by seven (7) days, Defendant’s Reply to Plaintiff’s Response by seven (7) days, and continue the hearing on Defendant’s Motion to Dismiss by fourteen (14) days, and state as follows:

1 1. On June 7, 2024, Plaintiff filed its Complaint in this action. See D.E.
2 1.

3 2. On August 19, 2024, Defendant filed its Motion to Dismiss, setting a
4 motion hearing for October 4, 2024, at 10:00 am. Making Plaintiff's Response to
5 the Motion to Dismiss due September 13, 2024 and Defendant's Reply in Support
6 of the Motion to Dismiss due September 20, 2024. See D.E. 24.

7 3. On September 12, 2024, Plaintiff requested that Defendant stipulate
8 to a seven (7) day extension of time for Plaintiff to respond to the Motion to
9 Dismiss and Defendant agreed if Plaintiff grant it an additional seven (7) days for
10 its Reply brief.

11 4. Whereas, Plaintiff and Defendant stipulate to a seven (7) day
12 extension of time for Plaintiff to respond and a seven (7) day extension of time to
13 the period for Defendant to file its Reply, making Plaintiff's Response to the
14 Motion to Dismiss due on September 20, 2024 and Defendant's Reply due on
15 October 4, 2024.

16 5. Additionally, to accommodate the stipulated briefing schedule,
17 Plaintiff and Defendant stipulate and request that the Court continue the hearing
18 date for Defendant's Motion to Dismiss to October 18, 2024 (or as soon thereafter
19 as the Court's schedule allows).

20 6. This stipulation and requested extension of time is being made in good
21 faith.

22 **WHEREFORE**, Plaintiff and Defendant agree to, and respectfully requests
23 that the Court grant this stipulation and continue the hearing on Defendant's
24 Motion to Dismiss.

25 **LOCAL RULE 7.3 CERTIFICATE**

1 Before filing this Request, undersigned counsel conferred with counsel for
2 Defendant (Connor J. Hansen, Esq.) who indicated that he agrees to the requested
3 relief, therefore, Defendant does not oppose this request.

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11 *Attorney for Plaintiff*

12 By: /s/ Lauren M. Hausman
13 Lauren M. Hausman, Esq.

14
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3 *Attorneys for Defendant*

4 By: /s/ Connor J. Hansen

5 Connor J. Hansen (*pro hac vice*)
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10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on September 13, 2024, I electronically filed the
12 foregoing document with the Clerk of the Court using CM/ECF, which will
13 electronically serve all counsel of record.

14 /s/ Lauren M. Hausman
15 Lauren M. Hausman, Esq.
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